

**To:** Berkoff, Michael[berkoff.michael@epa.gov]; Singer, Joshua[Singer.Joshua@epa.gov]; Cannon, Phillippa[Cannon.Phillippa@epa.gov]; Alcamo, Thomas[alcamo.thomas@epa.gov]; Drexler, Timothy[drexler.timothy@epa.gov]  
**Cc:** Kelley, Jeff[kelley.jeff@epa.gov]; Bassler, Rachel[Bassler.Rachel@epa.gov]; Chingcuanco, Leonardo[Chingcuanco.Leonardo@epa.gov]; Ballotti, Doug[ballotti.douglas@epa.gov]  
**From:** Short, Thomas  
**Sent:** Thur 9/1/2016 9:51:59 PM  
**Subject:** RE: New Questions from NWIT

Josh, some of these questions dig back, predate everyone on the project and many of them ask us to speculate or “Monday morning quarterback” the situation . I’m not sure how best to respond to those questions but referring back to our “process” is not the right answer either. Are you able to work with Michael’s replies?

Thomas Richard Short Jr.

Acting Deputy Director

Superfund Division

312-353-8826

short.thomas@epa.gov

**From:** Berkoff, Michael  
**Sent:** Thursday, September 01, 2016 2:53 PM  
**To:** Short, Thomas <short.thomas@epa.gov>; Singer, Joshua <Singer.Joshua@epa.gov>; Cannon, Phillippa <Cannon.Phillippa@epa.gov>; Alcamo, Thomas <alcamo.thomas@epa.gov>; Drexler, Timothy <drexler.timothy@epa.gov>  
**Cc:** Kelley, Jeff <kelley.jeff@epa.gov>; Bassler, Rachel <Bassler.Rachel@epa.gov>; Chingcuanco, Leonardo <Chingcuanco.Leonardo@epa.gov>  
**Subject:** RE: New Questions from NWIT

Here are Sarah’s new questions – she asked to disregard her previous questions, how should we respond?

An ATSDR report from 1998 states that during a site visit in May 1997, EPA reps told ATSDR and Indiana State Department of Health reps that the Anaconda facility was on the site of the present-day West Calumet Housing Complex and another lead smelter, Eagle Pitcher, was located in the middle part of the Calumet neighborhood (now zone 2). EPA has said it was

initially focused on the area south of 149<sup>th</sup> Street as part of current soil sampling activities in zone 2. Is that because Eagle Pitcher once stood south of 149<sup>th</sup>? Not exactly sure what she is talking about. When was this statement made. If there was any focus in sampling south of 149<sup>th</sup>, it might have been in the late 80's when we were looking for impact by USS Lead in the residential area. It might also have been during IDEM's 2007 sampling for the listing to show dispersal from USS Lead. During my tenure, we never focused sampling to explore the former Eagle Picher facility.

One of the recommendations in the ATSDR report in 1998 was "remediate the area of lead contamination at the Anaconda site, including the vicinity of the elementary school, to prevent current or future exposure." It appears an area on school grounds that tested at 1,400 ppm after EPA noticed construction work at Carrie Gosch was cleaned up. However, If EPA knew in 1997 of these former factories, and ATSDR recommended remediation at the Anaconda site in 1998, why wasn't extensive sampling done until 2014-15 to determine the full scope of contamination? My only answer is that we included the area in the USS Lead site and included it in the residential area because of present and future landuse was like the area east of it.

EPA has said that cleanup activities in 2011 and prior were done in areas of highest contamination. However, it appears from the many records I've read that sampling was done in a grid-like fashion, to get an accurate picture of the pattern of contamination over the entire operating area. Could EPA have sampled in a grid-like pattern while also focusing on so-called "hot spots"? This, to me, sounds unrealistic. We dealt with known high levels in yards. We expected to go out and deal with the rest in the remedial process. At the time, it was deemed too big a project for removal.

Also, the RI report released in 2012 says the area of the housing complex was excluded from lead and arsenic vertical distribution analysis because it was known that soil concentrations likely result from direct deposition. Why was the focus on the entire operating unit, instead of the areas where contamination was likely to be higher from direct deposition? We looked at the whole OU, because there is contamination throughout it. The vertical profile evaluation was to head off any claims from PRPs that we had a fill issue in the areas that had only been residential. The soil there is not native. This profile was handy during the negotiations with the PRPs.

A Sanborn insurance map shows the location of buildings on the Eagle Pitcher site. I have not yet found a similar map for the Anaconda site, but there's a good chance it exists. Could EPA have used such maps to determine where higher levels of contamination might be located in the footprints of the old Anaconda and Eagle Picher sites and then zero in on "hot spots." Was anything like this done? We did not do anything like that.

In retrospect, could EPA have focused in on the Anaconda and Eagle Pitcher areas more, while also sampling to get an accurate picture across the entire operating unit?

Can EPA explain this discrepancy? A July 2012 fact sheet on the proposed plan and another document outlining the proposed plan said that during the 2009-10 soil sampling lead was detected in surface and subsurface soils at up to 9,406 mg/kg and arsenic was found in surface and subsurface soil at concentrations up to 567 mg/kg. However, the remedial investigation report released in July 2012 and the record of decision released in November 2012 say the maximum detected soil lead concentration in a front-yard sample was 16,700 mg/kg from soil at 12 to 18 inches bgs on Aster Avenue and the maximum detected soil lead concentration in a backyard sample was 27,100 mg/kg in soil from 18 to 24 inches on East 150th Place. Can EPA explain why the fact sheet and proposed plan document, which were more likely to be read by the public, appear to have included an incorrect maximum lead concentration? Do you have an answer included in another email? Those higher levels were identified during QA/QC as overestimates.

According to East Chicago officials, EPA did not sample West Calumet until 2009. Is that correct? Yes

A 2004 letter from IDEM to the EPA's Jan Pels said IDEM and EPA sampled residential properties during a RCRA program and found high levels of lead. The letter further stated IDEM was deferring all further investigations at the site to EPA because of the ongoing Superfund investigation and recommending no further action. If EPA knew of high lead levels in residential areas in 2004, why wasn't more testing done in the area of the former Anaconda plant at that time?

What were specific soil test results at Carrie Gosch Elementary School from the soil samples taken in 2014-15? Or, what is the code for the school in the spreadsheet EPA has? It's a public building, so I don't think EPA's concern about removing identifying factors applies for the school.

After 2009-10, did EPA notify properties owners by phone or letter of the results from sampling?

After the 2009-10 soil testing, did EPA go door to door to notify residents of the risks of lead?

It appears Mr. Kaplan told the New York Times that part of the delay in releasing results from

2014-15 sampling was due to a problem with a contractor. He has told me that on background. Can we put it on the record now?

**From:** Short, Thomas  
**Sent:** Thursday, September 01, 2016 1:56 PM  
**To:** Singer, Joshua <[Singer.Joshua@epa.gov](mailto:Singer.Joshua@epa.gov)>; Cannon, Phillippa <[Cannon.Phillippa@epa.gov](mailto:Cannon.Phillippa@epa.gov)>; Alcamo, Thomas <[alcamo.thomas@epa.gov](mailto:alcamo.thomas@epa.gov)>; Drexler, Timothy <[drexler.timothy@epa.gov](mailto:drexler.timothy@epa.gov)>  
**Cc:** Kelley, Jeff <[kelley.jeff@epa.gov](mailto:kelley.jeff@epa.gov)>; Bassler, Rachel <[Bassler.Rachel@epa.gov](mailto:Bassler.Rachel@epa.gov)>; Berkoff, Michael <[berkoff.michael@epa.gov](mailto:berkoff.michael@epa.gov)>; Chingcuanco, Leonardo <[Chingcuanco.Leonardo@epa.gov](mailto:Chingcuanco.Leonardo@epa.gov)>  
**Subject:** RE: New Questions from NWIT

Wow, these are really borrowing down into details. I'm cc'ing Michael and Leo. Perhaps they can help out with responses.

Thomas Richard Short Jr.

Acting Deputy Director

Superfund Division

312-353-8826

[short.thomas@epa.gov](mailto:short.thomas@epa.gov)

**From:** Singer, Joshua  
**Sent:** Thursday, September 01, 2016 1:33 PM  
**To:** Cannon, Phillippa <[Cannon.Phillippa@epa.gov](mailto:Cannon.Phillippa@epa.gov)>; Alcamo, Thomas <[alcamo.thomas@epa.gov](mailto:alcamo.thomas@epa.gov)>; Short, Thomas <[short.thomas@epa.gov](mailto:short.thomas@epa.gov)>; Drexler, Timothy <[drexler.timothy@epa.gov](mailto:drexler.timothy@epa.gov)>  
**Cc:** Kelley, Jeff <[kelley.jeff@epa.gov](mailto:kelley.jeff@epa.gov)>; Bassler, Rachel <[Bassler.Rachel@epa.gov](mailto:Bassler.Rachel@epa.gov)>  
**Subject:** Fw: New Questions from NWIT

Phillippa, Tom, Tom and Tim,

Please take a look at the questions below. The reporter said her deadline is tomorrow (Friday) morning. Please let me know how you recommend responding. Thank you.

Josh

---

**From:** Bassler, Rachel  
**Sent:** Wednesday, August 31, 2016 4:43 PM  
**To:** Lee, Monica; Grantham, Nancy; Benenati, Frank; Kelley, Jeff; Singer, Joshua  
**Subject:** New Questions from NWIT

Here are Sarah's new questions – she asked to disregard her previous questions, how should we respond?

An ATSDR report from 1998 states that during a site visit in May 1997, EPA reps told ATSDR and Indiana State Department of Health reps that the Anaconda facility was on the site of the present-day West Calumet Housing Complex and another lead smelter, Eagle Pitcher, was located in the middle part of the Calumet neighborhood (now zone 2). EPA has said it was initially focused on the area south of 149<sup>th</sup> Street as part of current soil sampling activities in zone 2. Is that because Eagle Pitcher once stood south of 149<sup>th</sup>?

One of the recommendations in the ATSDR report in 1998 was “remediate the area of lead contamination at the Anaconda site, including the vicinity of the elementary school, to prevent current or future exposure.” It appears an area on school grounds that tested at 1,400 ppm after EPA noticed construction work at Carrie Gosch was cleaned up. However, If EPA knew in 1997 of these former factories, and ATSDR recommended remediation at the Anaconda site in 1998, why wasn't extensive sampling done until 2014-15 to determine the full scope of contamination?

EPA has said that cleanup activities in 2011 and prior were done in areas of highest contamination. However, it appears from the many records I've read that sampling was done in a grid-like fashion, to get an accurate picture of the pattern of contamination over the entire operating area. Could EPA have sampled in a grid-like pattern while also focusing on so-called “hot spots”? This, to me, sounds unrealistic.

Also, the RI report released in 2012 says the area of the housing complex was excluded from lead and arsenic vertical distribution analysis because it was known that soil concentrations likely result from direct deposition. Why was the focus on the entire operating unit, instead of the areas where contamination was likely to be higher from direct deposition?

A Sanborn insurance map shows the location of buildings on the Eagle Pitcher site. I have not yet found a similar map for the Anaconda site, but there's a good chance it exists. Could EPA have used such maps to determine where higher levels of contamination might be located in the footprints of the old Anaconda and Eagle Picher sites and then zero in on "hot spots." Was anything like this done?

In retrospect, could EPA have focused in on the Anaconda and Eagle Pitcher areas more, while also sampling to get an accurate picture across the entire operating unit?

Can EPA explain this discrepancy? A July 2012 fact sheet on the proposed plan and another document outlining the proposed plan said that during the 2009-10 soil sampling lead was detected in surface and subsurface soils at up to 9,406 mg/kg and arsenic was found in surface and subsurface soil at concentrations up to 567 mg/kg. However, the remedial investigation report released in July 2012 and the record of decision released in November 2012 say the maximum detected soil lead concentration in a front-yard sample was 16,700 mg/kg from soil at 12 to 18 inches bgs on Aster Avenue and the maximum detected soil lead concentration in a backyard sample was 27,100 mg/kg in soil from 18 to 24 inches on East 150th Place. Can EPA explain why the fact sheet and proposed plan document, which were more likely to be read by the public, appear to have included an incorrect maximum lead concentration?

According to East Chicago officials, EPA did not sample West Calumet until 2009. Is that correct?

A 2004 letter from IDEM to the EPA's Jan Pels said IDEM and EPA sampled residential properties during a RCRA program and found high levels of lead. The letter further stated IDEM was deferring all further investigations at the site to EPA because of the ongoing Superfund investigation and recommending no further action. If EPA knew of high lead levels in residential areas in 2004, why wasn't more testing done in the area of the former Anaconda plant at that time?

What were specific soil test results at Carrie Gosch Elementary School from the soil samples taken in 2014-15? Or, what is the code for the school in the spreadsheet EPA has? It's a public

building, so I don't think EPA's concern about removing identifying factors applies for the school.

After 2009-10, did EPA notify properties owners by phone or letter of the results from sampling?

After the 2009-10 soil testing, did EPA go door to door to notify residents of the risks of lead?

It appears Mr. Kaplan told the New York Times that part of the delay in releasing results from 2014-15 sampling was due to a problem with a contractor. He has told me that on background. Can we put it on the record now?

Rachel Bassler

Press Officer

U.S. EPA Region 5

[bassler.rachel@epa.gov](mailto:bassler.rachel@epa.gov)

p: 312-886-7159

c: 312-914-3393